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Attorney for Defendant Todd Johnson

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

Comes now, appointed counsel Phil Brown Esq., and hereby moves this Court request a Pre-Plea Pre-Sentence Investigation Report be prepared by the Probation department.

1) The calculation of Defendant Todd Johnson's criminal history will drastically impact his sentencing exposure, negotiations, and client's decision as to how he should proceed. A pre-

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1 plea presentence report will promote judicial economy and aid in the manner in which this case  
2 is ultimately resolved.

3 2) Undersigned counsel therefore respectfully requests an order that the Department of  
4 Probation conduct a pre-plea presentence investigation report as soon as possible.  
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6 3) Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney  
7 Phillip Smith regarding this request and he has no opposition.  
8

9 DATED this 23rd day of August, 2016.  
10

11 /s/ Philip H. Brown  
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13 Philip H. Brown, Esq.  
14 200 Hoover Ave, Suite #130  
15 Las Vegas, Nevada 89101  
16 Attorney For The Defendant  
17 Todd Johnson  
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8 Phil@thelasvegasdefender.com  
9 Attorney for Defendant – Todd Johnson

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

**IT IS HEREBY ORDERED** that Defendant Todd Johnson's Unopposed Motion for a Pre-Plea Presentence Investigation Report (ECF No. 89) is **GRANTED**.

**IT IS FURTHER ORDERED** that the United States Probation Office shall prepare and provide to the Court by October 24, 2016, a Pre-Plea Presentence Investigation Report with the guideline calculation requested for Defendant's **criminal history only**.

**DATED** this 23 day of August, 2016.

Gloria M. Navarro, Chief Judge  
United States District Court

1 CERTIFICATE OF SERVICE  
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3 The undersigned hereby certifies that she is an employee of Brown Law Offices,  
4 Chartered, and is a person of such age and discretion as to be competent to serve papers.

5 That on August 23, 2016, he served an electronic copy of the above and foregoing  
6 UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING  
7 INVESTIGATION REPORT by electronic service (ECF) to the person named below:  
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9  
10 DANIEL BOGDON  
11 United States Attorney

12 PHILLIP SMITH, ESQ.  
13 Assistant United States Attorney

14 PAOLA ARMENI, ESQ.  
15 Attorney for Dywon Johnson

16 OSWALDO FUMO, ESQ.  
17 Attorney for Torrence Douglas

18 JENNIFER WALDO, ESQ.  
19 Attorney for Antoine Evans

20 KAREN CONNOLLY, ESQ.  
21 Attorney for Reggie Pratt

22 DAVID BROWN, ESQ  
23 Attorney for Antonio Randolph

24 RANDALL ROSKE, ESQ.  
25 Attorney for Dominique Grace

26 JOHN G. GEORGE, ESQ.  
27 Attorney for Ronald Smith

28 /s/ Mary D. Brown

Employee of Brown Law Offices, Chartered